## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

ENCOMPASS INSURANCE COMPANY OF MASSACHUSETTS,	) ) )
Plaintiff/Defendant-in-Counterclaim,	)
v.	)
JOSEPH D. GIAMPA, FREDERICK T.	) Case No. 05-11693 RCL
GIAMPA, ADVANCED SPINE CENTERS, INC. d/b/a FIRST SPINE REHAB, FUTURE	)
MANAGEMENT CORPORATION, FUTURE MANAGEMENT BUSINESS TRUST, EDWARD	)
KENNEDY, BRIAN J. CULLINEY, D.C. and JENNIFER MCCONNELL, D.C.,	)
, ,	)
Defendants.	)

## **CERTIFICATION PURSUANT TO LOCAL RULE 7.1(a)(2)**

Pursuant to Local Rule 7.1(a)(2), I hereby certify that I have conferred with counsel for the plaintiff and attempted in good faith to resolve or narrow the issues addressed in Emergency Motion for Extension of Time for Defendants Brian J. Culliney and Jennifer McConnell to Respond to Plaintiff's Written Discovery Requests.

Respectfully submitted,

/s/ Thomas M. Ciampa

Thomas M. Ciampa (BBO# 566898) Ciampa & Associates 20 Park Plaza, Suite 804 Boston, MA 02116 (617) 742-5955

Dated: March 5, 2007

## **Certificate of Service**

I, Thomas M. Ciampa, hereby certify that on this 5<sup>th</sup> day of March, 2007, this document was filed through the CM/ECF and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

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/s/ Thomas	1\/I	Liamna
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